



File Code: 2810
Date: September 5, 2019

Dear Interested Party:

This letter initiates scoping for Copper King 2019 exploration drilling project on Globe Ranger District of Tonto National Forest. The project is located near Forest Roads 342 and 2458, approximately 2 miles northeast of the Town of Superior. Legal location of the project is Township 1 South, Range 12 East, Sections 13 and 18; and Township 1 South, Range 13 East, Sections 17, 20, 21 and 28, in Pinal County, Arizona (see Exhibit A).

It is anticipated that this proposal may be categorically excluded from documentation in an environmental assessment or an environmental impact statement as a category of activity that allows short term (1 year or less) mineral investigations and incidental support activities, such as authorizing a plan for exploration which uses existing roads, cross-country travel by vehicles and equipment, and clearing of vegetation for drill pads (36 CFR 220.6 (e)(8)).

Background

Aspects of this project have been scoped before; a scoping letter dated June 19, 2018, was sent to interested parties regarding two drilling exploration proposals, the Copper King and Superior West projects. The scope of the Copper King project has changed; it has reduced in size, duration, and number of drill sites, and therefore we are inviting public comment on the current proposal. Copper King 2019 project proposal was submitted April 2019 and is a second look at a project area that was previously explored by Bronco Creek Exploration. The previous exploration occurred in the fall and winter of 2016 and reclamation was completed in early 2017, where three drill sites and one laydown yard were used and reclaimed within 1 year of authorization. There is nothing from the previous Copper King exploration project that occurs or continues to exist today.

Federal Mining Laws

Laws governing activities on National Forest System lands provide public a statutory right to conduct locatable mineral exploration, provided activities are reasonably incidental to mining and comply with other Federal laws and regulations (including but not limited to General Mining Act of 1872, Organic Administration Act of 1897, Multiple Surface Use Mining Act of 1955, and case law). Forest Service is directed to regulate such activities for purpose of minimizing adverse environmental effects and to provide for reclamation of surface resources (36 CFR Part 228A).

Forest Plan Direction

Tonto National Forest Land and Resources Management Plan (Tonto Forest Plan) provides forest wide management direction pertinent to minerals, stating "Support environmentally sound energy and minerals development" (page 22, Tonto Forest Plan 1985, as amended). Bronco Creek Exploration's proposed Copper King 2019 drilling project is located in Tonto Forest Plan



management area 2F. For this management area, direction for minerals includes processing plans of operation.

Purpose and Need

Purpose of the project is to conduct exploration drilling: Bronco Creek Exploration, on behalf of Kennecott Exploration Company, proposes drilling from a maximum of four drill sites of six identified. Bronco Creek Exploration must conduct mining operations in accordance with requirements of 36 Code of Federal Regulations Part 228A, and in accordance with plans of operation that have been approved by the Forest Service. Forest Service is required to respond to proposed plans of operations on National Forest System lands.

Proposed Action

Bronco Creek Exploration, on behalf of Kennecott Exploration Company, proposes drilling from a maximum of four drill sites of six identified (4 largest drill sites plus laydown yard measure 1.10 acres). Proposed activities include road improvements and laydown yard, in addition to drilling (see table below). Three sites are accessed by vehicle, three are accessed by helicopter. Sites were selected in pre-existing disturbed areas that are mostly open, flat, and need relatively little preparation for use. Much of the proposed disturbance lies within pre-disturbed Omya Queen Creek Quarry. See Exhibit B for a drill site schematic.

Project Parameters		Acres
Drill sites proposed	3 by helicopter; 3 by vehicle access	--
Drill sites to be used	Up to 4	0.23+0.23+0.23+0.18
Laydown Yard	1	0.23
Total Disturbance		1.10 acres

Additional details and project activities description may be found on the project website:
<https://www.fs.usda.gov/project/?project=56690>.

Design Features and Mitigation Measures

The applicant, Bronco Creek Exploration proposed the following project design features into their Plan of Operations:

- **Air Water** will be sprayed on drill sites and any access roads if necessary to control dust.
- **Access** Appropriate road signage will be used to warn other Forest users of potential hazards.
- **Water Quality** There would be no discharges to surface tributaries, and, in accordance with Clean Water Act requirements, no pollutants would be discharged. Activities would be in compliance with applicable state and federal laws, and would meet Arizona surface water quality standards.
- **Water Quality** Stockpiles of topsoil and excavated materials will be protected from surface runoff and erosion during times of precipitation.
- **Water Quality** Drilling waters and muds will be contained at each drill pad by a sump, and all equipment and waste will be removed at close of operations.

- **Solid Waste** Trash will be disposed of properly in a trash container and taken off site daily for disposal. All waste materials generated through operations will be collected and disposed of at the landfill at close of operations.
- **Scenic Values** Project designed to minimize disturbance of scenic values by focusing much of total acreage of proposed sites on preexisting disturbance at Omya Queen Creek Quarry.
- **Scenic Values** Exploration drilling operations will be completed as quickly as possible, and reclamation will be completed without delay.
- **Wildlife** Special additional measures we will enforce include: respecting speed limit signs when using Forest roads, securely containing and removing refuse, installing wildlife fencing around sumps, building a ramp into sumps to aid wildlife/livestock escape.
- **Wildlife** transplanting any barrel cactus, pincushion cactus, ocotillo, and agave species located within areas proposed to be disturbed, and reclaiming all drill sites to their initial state immediately upon cessation of drilling.
- **Wildlife** Additionally, we will instruct crews to avoid all wildlife, check under vehicles and equipment before using or moving and to follow "Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects" published by Arizona Game and Fish Department.
- **Cultural Resources** Known National Register of Historic Places eligible sites will be avoided by any ground-disturbing activity. If previously undiscovered cultural resources (historic or prehistoric objects, artifacts or sites) are exposed as a result of operations, all work will immediately cease at that location and Globe Ranger District office will be notified of the discovery. Operations will not proceed at that location until further direction is received from Forest Archaeologist.
- **Hazardous Substances** Equipment using hazardous substances will be placed on thick puncture resistant plastic sheeting with environmental hydrocarbon absorbent pads on top to prevent any potential leaks from contaminating ground. All equipment and petroleum product containers will be removed at close of operations. Industry standard materials and additives will be used on the project and Safety Data Sheets will be provided prior to beginning of operations.

Additionally, we are considering the following mitigation measures, which would become Terms and Conditions of an approved Plan of Operations and adhered to during project implementation. Mitigation measures are measures that are taken to minimize potential impacts that may occur due to implementation of the proposed action. Mitigation measures are also developed to address concerns raised about the proposed action.

Drilling Operations and Access

1. District Ranger and minerals administrator would be informed of which site(s) would be mobilized at least 2 business days prior to mobilization, and 2 days before estimated demobilization. Detailed reclamation schedules would be provided as they are developed.
2. Provide a copy of the formal agreement between Omya and Bronco Creek Exploration regarding use of their quarry and claims for drilling purposes prior to commencement of exploration activities at Omya Queen Creek Quarry location.

3. Sites accessed by helicopter must adhere to Phoenix Interagency Fire Center requirements for communication and utilize a Flight and Safety Plan.
4. When mobilizing a drill rig to the project area and when moving from site to site, spotters would be used in both front and behind vehicle transporting drill rig to ensure safety of Forest users and potential wildlife on roadways.
5. Drill pads accessed by helicopter shall be flagged at 5 to 10 foot intervals to ensure disturbance does not exceed permitted area. Any deviation from pads outlined in the Plan of Operations (i.e. expansion into 50 foot cleared buffer) would be reported to District Ranger with a plan map of the deviation.
6. The minerals administrator shall be notified at least 24 hours prior to plugging of drill holes to provide for field inspection and monitoring of plugging activities by a Forest Service minerals administrator.
7. All drill holes shall be plugged with cement or bentonite grout placed from bottom of drill hole to a depth of 2 feet below ground surface. Plugging of all drill holes shall be consistent with Arizona Administrative Code RI2-15-816, Arizona Department of Water Resources Well Abandonment Handbook and ASTM (American Society for Testing and Materials) Standard Guide for Decommissioning of Groundwater Wells, Vadose Zone Monitoring Devices, Boreholes, and Other Devices for Environment Activities (ASTM D5299-99).
8. Operator shall engage a professional geologist or engineer registered in the state of Arizona to conduct independent third-party construction quality assurance oversight during plugging of all drill holes. A report documenting plugging methods and construction quality assurance activities shall be prepared by a third-party geologist or engineer for each drill hole, and shall be submitted to Forest Service within 60 days after completion of plugging activities.
9. Operator would comply with all applicable Federal and State fire laws and regulations, and would take all reasonable measures to prevent and suppress fires on area of operations. Operator would require all of its employees, contractors, and subcontractors to do the same. Operation is subject to more specific fire guidance at direction of the District Ranger depending upon local conditions.

Reclamation and Other Compliance

10. Use native and weed free species for all reclamation on forest, following testing procedures for seed mixes and send certifications to Minerals Group biologist prior to use on forest:
<http://www.fs.usda.gov/detail/tonto/landmanagement/resourcemanagement/?cid=fsbdev3018789>.
11. Detailed receipts from landfill to document appropriate method of disposal, and copies would be submitted to Forest Service within 30 days of receipt.
12. Operator would list Tonto National Forest as "Landowner" on all Notice of Intent to Drill and Abandon an Exploration / Specialty Well, Arizona Department of Water Resources Form 55-43B, and provide copies of submitted forms to minerals administrator.
13. For documentation of operator's compliance with 36 CFR 228.8(a) through (h), copies of all documents submitted to and received from Arizona Department of Water Resources, Arizona Department of Environmental Quality, or other state or Federal agencies

certifying or approving compliance with their respective laws and regulations would be promptly submitted to the minerals administrator.

Comments

If you have information you feel the Forest Service may not be aware of, especially any extraordinary circumstances, regarding the Proposed Action, please send these in writing on or before **September 22nd, 2019**. Please send your questions, concerns, or mitigations to: B. Chad Harrold, Geologist, 7680 S. Six Shooter Canyon Road, Globe, AZ 85501, or (928) 402-6200, or email comments-southwestern-tonto-globe@usda.gov.

When submitting comments, please keep them specific to this proposal only. Comments which are not specific to the project and project area will be deemed outside the scope of analysis and will not be considered. If you are including references, citations, or additional information to be considered for this project, **please provide a copy**, and specify exactly how the material relates to the project. Also indicate exactly what part of the material you would like us to consider (such as page or figure number).

Comments received in response to this scoping notice, including names and addresses of those who comment, will be considered part of the public record on this project and will be available for public inspection. Electronic comments must show name and address of submitter.

Comments submitted anonymously will be accepted and considered. Additionally, any persons may request the agency to withhold a submission from the public record by showing how Freedom of Information Act (FOIA) permits such confidentiality (7 CFR 1.27(d)).

Sincerely,



MARK SANDO

District Ranger

Enclosure

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Copper King 2019: Exhibit A

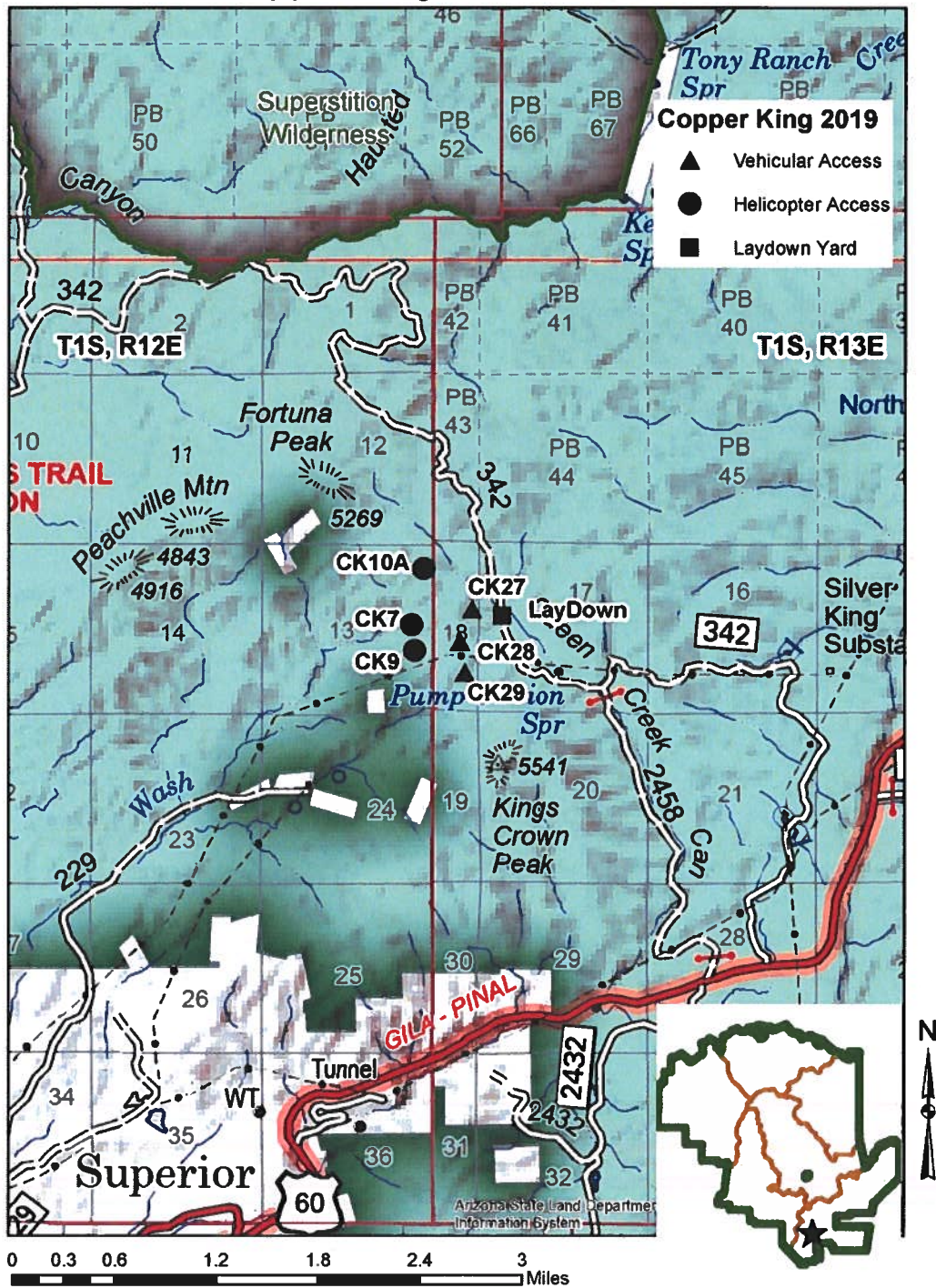


Exhibit B: Drill Site Schematic

